

1 E. MARTIN ESTRADA  
United States Attorney  
2 CAMERON L. SCHROEDER  
Assistant United States Attorney  
3 Chief, National Security Division  
ANDREW M. ROACH (Cal. Bar No. 293375)  
4 Assistant United States Attorney  
Cyber & Intellectual Property Crimes Section  
5 1500 United States Courthouse  
312 North Spring Street  
6 Los Angeles, California 90012  
Telephone: (213) 894-0306  
7 Facsimile: (213) 894-2927  
E-mail: andrew.roach@usdoj.gov  
8

Attorneys for Plaintiff  
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 ANTHONY DAVID FLORES,  
aka "Anton David," and  
16 ANNA RENE MOORE,

17 Defendants.  
18

No. 2:22-CR-00593-PA

GOVERNMENT'S EX PARTE APPLICATION  
FOR ORDER SEALING VICTIM IMPACT  
STATEMENT AND EXHIBITS TO  
GOVERNMENT'S SENTENCING POSITION

19 Plaintiff United States of America, by and through its counsel  
20 of record, the United States Attorney for the Central District of  
21 California and Assistant United States Attorney Andrew M. Roach,  
22 hereby applies ex parte for an order that the Victim Impact Statement  
23 and Government's Exhibits to Sentencing Position be filed under seal.

24 //

25 //

26 //

27

28

1        This ex parte application is based upon the attached declaration  
2 of Andrew M. Roach.

3  
4 Dated: June 3, 2024

Respectfully submitted,

5 E. MARTIN ESTRADA  
6 United States Attorney

7 CAMERON L. SCHROEDER  
8 Assistant United States Attorney  
Chief, National Security Division

9        /s/ Andrew M. Roach  
10 ANDREW M. ROACH  
Assistant United States Attorney

11 Attorneys for Plaintiff  
12 UNITED STATES OF AMERICA  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF ANDREW M. ROACH**

I, Andrew M. Roach, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in this case.

2. The government requests that the Court file under seal the documents filed concurrently herewith, the Victim Impact Statement and Government's Exhibits to Sentencing Position, because the attached exhibits reference the victim's name and other sensitive personal information. The government requests this under the Crime Victims' Rights Act. The government requests to file these documents under seal because they are all subject to the protective order in this case, and it would be unduly burdensome for the government to redact the entirety of the documents.

3. I have communicated with defendant Anthony David Flores's attorney, Ambrosio E. Rodriguez, who does not oppose this filing.

4. Should the Court deny this application, the government requests that this application not be filed, but be returned to the government, without filing of the documents or reflection of the name or nature of the documents on the clerk's public docket.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on June 3, 2024.



ANDREW M. ROACH